

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES,

Plaintiff,

v.

No. 23-20191

DEMETRIUS HALEY,

Defendant.

UNOPPOSED MOTION TO AMEND RELEASE CONDITION REGARDING CONTACT
WITH CO-DEFENDANTS

Comes now the defendant, Demetrius Haley, by and through his undersigned counsel of record, Michael J. Stengel, Esq., and moves this court to amend the release condition that he have no contact with his co-defendants. In support thereof, Mr. Haley would show:

1. Mr. Haley was ordered no to have any contact with his co-defendants as a condition of his release in this matter. (R. 20, Order Setting Release Conditions).

2. Mr. Haley and his co-defendants herein are also the defendants in Tennessee v. Haley, et al, Shelby Crim. No. 23-00241. The physical layout of the Shelby County Criminal Justice Center, required court appearances, and security arrangements made by the Shelby County Sheriff's Department make the "no contact with co-defendants" requirement impractical.

3. A modification of the "no contact with co-defendants" release condition to enable contact with, but no discussion of the pending case with his co-defendants by Mr. Haley should satisfy the Court's concern to prevent any inappropriate conduct but allow routine court appearances and ingress/egress of court buildings without a violation of the release conditions.

4. Prior to filing this motion counsel discussed the issue with the Pretrial Services office. Officer Walker understood the concern, but felt the request needed to be made to the court, rather than Pretrial Services.

5. Consistent with L.Crim.R. 12.1(a), the undersigned discussed this request with AUSA Pritchard. No specific language regarding amending the condition was discussed, however, the United States has no objection to the "no contact with co-defendants" release condition being amended.

Respectfully submitted,

S/Michael J. Stengel

Michael J. Stengel (12260)
Lawyer for Demetrius Haley
619 South Cooper Street
Memphis, TN 38104
(901) 527-3535

Certificate of Service

I hereby certify that I have served a copy of the foregoing Motion to Amend Release Conditions by electronic means, via the

Court's electronic filing system, on AUSA's David Pritchard and Libby Rogers this 18th day of September, 2023.

S/Michael J. Stengel